

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: : BANKRUPTCY NO. 14-10390TPA
:
DONALD EUGENE MOYER, JR. and :
TONYA HELENE MOYER, his wife : HON. THOMAS P. AGRESTI
Debtors :
:
MID-FIRST BANK, : CHAPTER 13
Movant :
v. : RELATED TO CLAIM NO. 5
:
DONALD EUGENE MOYER, JR. and :
TONYA HELENE MOYER, his wife; and :
RONDA J. WINNECOUR, ESQUIRE, :
CHAPTER 13, :
Respondents :

DECLARATION

I hereby certify as counsel for the Debtors that the existing Chapter 13 Plan is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY
& KROTO, INC.

By /s/Michael S. JanJanin
Michael S. Jan Janin, Esq.
Pa. I.D. No. 38880
2222 West Grandview Boulevard
Erie, PA 16506-4508
Phone: (814) 833-2222, Ext. 1045
Phone: (814) 314-1051 (Direct)
Fax: (814) 833-6753
Email: mjanjanin@quinnfirm.com
#1054837
Attorneys for Debtors, Donald Eugene Moyer, Jr. and
Tonya Helene Moyer, his wife

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: : BANKRUPTCY NO. 14-10390TPA
DONALD EUGENE MOYER, JR. and :
TONYA HELENE MOYER, his wife : HON. THOMAS P. AGRESTI
Debtors :
MID-FIRST BANK, : CHAPTER 13
Movant : RELATED TO CLAIM NO. 5
v. :
DONALD EUGENE MOYER, JR. and :
TONYA HELENE MOYER, his wife; and :
RONDA J. WINNECOUR, ESQUIRE, :
CHAPTER 13, :
Respondents :

CERTIFICATE OF SERVICE OF DECLARATION

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on June 5, 2017.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: Electronic Notification.

Ronda Winnecour, Esquire, Chapter 13 Trustee
Via the CM/ECF system - cmevf@chapter13trusteewdpa.com

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: June 5, 2017

By: /s/Michael S. JanJanin
Signature

Michael S. Jan Janin, Esq.
Typed Name

2222 W. Grandview Blvd., Erie, PA 16506-4508
Address

(814) 833-2222 ext. 1045
Phone No.

PA ID #38880
List Bar I.D. and State of Admission